

FOR THE EASTERN DISTRICT OF NEW YORK		
<p>-----</p> <p>AMER SULIEMAN</p> <p></p> <p>Plaintiff(s),</p> <p></p> <p>-against-</p> <p></p> <p>JEBARA IGBARA, MOTASHEM R. KHALIL AND JOUMANA DANOUN</p> <p>Defendant(s).</p> <p>-----</p>	<p>X</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>X</p>	<p>No. 20 CV 6032</p>

In accordance with Federal Rule of Civil Procedure 26(f), counsel for the parties spoke via email beginning 08/31/21 and exchanged communications thereafter, and submit the following report for the court's consideration:

The information required by Rule 26(a)(1) of the Federal Rules of Civil Procedure was
be disclosed by Plaintiff(s) on 9/15/2021.

The parties jointly propose to the Court the following discovery plan:

- a. All fact discovery must be completed by 3/15/2022.

- b. The parties are to conduct discovery in accordance with the Federal Rules

of Civil The parties are to conduct discovery in accordance with the Federal Rules of Civil Procedure and the Local Rules of the Eastern District of New York. The following interim deadlines may be extended by the parties on consent without application to the Court,

provided that the parties meet the deadline for completing fact discovery set forth in 3(a) above.

- i. Depositions: Depositions shall be completed by 1/15/22 and limited to no more than 2 depositions per party. Absent an agreement between the parties or an order from the Court, non-party depositions shall follow initial party depositions.
- ii. Interrogatories: Initial sets of interrogatories shall be served on or before 10/15/21 and responses shall be due on 11/15/21. All subsequent interrogatories must be served no later than 30 days prior to the discovery deadline.
- iii. Requests for Admission: Requests for admission must be served on or before 10/15/21 and responses shall be due on 11/15/21.
- iv. Requests for Production: Initial requests for production were/will be exchanged on 10/15/21 and responses shall be due on 11/15/21. All subsequent requests for production must be served no later than 30 days prior to the discovery deadline.
- v. Supplementation: Supplementations under Rule 26(e) must be made within a reasonable period of time after discovery of such information.

3. **Amendments to Pleadings**

- a. Are there any amendments to pleadings anticipated? No.
- b. Last date to amend the Complaint: N/A

4. **Expert Witness Disclosures**

At this time, the parties **do**/do not (circle one) anticipate utilizing experts. Expert discovery shall be completed by 1/15/2022

Expert disclosures shall be due by 2/15/2022

5. **Anticipated Motions**

A Motion to dismiss for failure to state a claim etc. was brought by defendant KHALIL and is pending. Summary judgment motions will be brought in the event that is necessary.

6. **Early Settlement or Resolution**

The parties **have not** discussed the possibility of settlement. The parties request a settlement conference by no later than (see below). The following information is needed before settlement can be discussed:


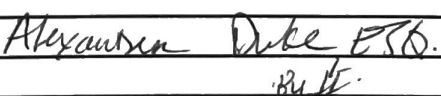

Plaintiff prefers a referral to the Eastern District's Mediation Program.

7. **Trial**

- a. The parties anticipate that this case will be ready for trial by 6/15/22
- b. The parties anticipate that the trial of this case will require 2-3 days.
- c. The parties **do** consent to a trial before a Magistrate Judge at this time.
- d. The parties request a jury/**bench** (circle one) trial.

8. **Other Matters**

Respectfully submitted this 1st day of September 2021.

ATTORNEYS FOR PLAINTIFF(S): Jeremy M. Iandolo, Esq. 7621 13 th Avenue Brooklyn NY 11228 jiandolo@jiandololaw.com 	ATTORNEYS FOR DEFENDANT(S): Alexander F. Duke, Esq. Alexander F. Duke PC For: MOTASEM KHALIL  By 
--	---

SO ORDERED

Date: _____
New York, New York

United States Magistrate Judge